

(CANNED)

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DONALD RENKOWIC  
PLAINTIFF.

Vs.

04 - 30202 - MAP

FRANKLIN COUNTY HOUSE OF CORRECTION AND  
JAIL, SHERIFF FREDERICK MACDONALD, ET., AL.  
DEFENDANTS.

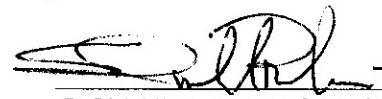
AFFIDAVIT IN SUPPORT OF A MOTION TO COMPEL PRODUCTION

I DONALD RENKOWIC, BEING FIRST DULY SWORN, ON HIS OATH  
STATES ;

THAT HE IS THE ABOVE NAMED PLAINTIFF AND HE MAKES THIS  
AFFIDAVIT IN SUPPORT OF THE MOTION FOR PRODUCTION OF DOCUMENTS  
AND THINGS FOR INSPECTION, COPYING AND PHOTOGRAPHING WHICH IS  
ATTACHED HERETO ; THAT THE PRODUCTION OF THE DOCUMENTS,  
PAPERS, STATEMENTS, AND THINGS REQUESTED IS MADE IN GOOD FAITH;  
THAT HE HAS BEEN INFORMED AND THEREFORE BELIEVES THAT THE  
MATTERS AND THINGS SO SOUGHT IN THE MOTION ARE COMPETENT AS  
EVIDENCE IN SAID CAUSE AND ARE ESPECIALLY COMPETENT BY REASON  
OF THE FACT THAT THE DOCUMENTS ARE NECESSARY FOR SUPPORTING  
HIS COMPLAINT; THAT THE FACTS SOUGHT TO BE ELICITED ARE FACTS  
NECESSARY TO BE SHOWN AND PRODUCED IN SAID CAUSE IN THE  
FURTHERANCE OF JUSTICE AND IN SECURING ALL THE FACTS COMPETENT  
UPON THE ISSUES TO BE TRIED.

THE MOTION HEREIN MADE IS MADE IN GOOD FAITH AND THE  
AFFIANT AS ONE OF COUNSEL FOR THE PLAINTIFF DESIRES TO INSPECT  
THE DOCUMENTS SOLELY FOR THE PURPOSE OF ESTABLISHING FACTS TO  
BE USED AS EVIDENCE IN THE ABOVE CAUSE AND THE AFFIANT DOES NOT  
INTEND TO USE SAID INFORMATION FOR ANY OTHER PURPOSE OR TO  
CONVEY THE SAME TO ANY OTHER PARTY OR PERSONS

DATED THIS 28<sup>th</sup> DAY OF September 2004,



DONALD RENKOWIC, PRO SE.  
160 ELM STREET  
GREENFIELD, MASS. 01301